

**Response:** The Office of Managing Director (OMD), Associate Managing Director for Operations, Operations Support Division.

**Interrogatory No. 5.** Describe your job responsibilities as of October 8, 1991.

**Response:** As Security Officer and the Alternate Agency Ethics Official, my duties included, but were not limited to, the investigation and preparation of responses to ex parte correspondence or inquiries received by the Commission. My activities involved the review of agency files and dockets, the preparation of draft correspondence, and the coordination of these matters with the appropriate Bureau/Office. Upon completion of such assignments for the Managing Director, the original incoming letter and a copy of the outgoing Commission reply were placed in a docket correspondence file. All parties to the particular matter in question were then served with a copy of the correspondence.

**Interrogatory No. 6.** Describe your role in the preparation of the Managing Director's Letter.

**Response:** After receiving Mr. George G. Daniel's incoming letter in mid-September 1991, I reviewed the public file concerning the subject proceeding. I then consulted with Steve Sewell and Paul Gordon, Mass Media Bureau (MMB), Video Services Division, to determine the status of that proceeding, and whether or not it was restricted. Upon learning that the proceeding was restricted, I prepared a draft reply as reflected in the Managing Director's Letter of October 8, 1991. The draft of my reply was forwarded to Steve Bailey and David Solomon, Office of General Counsel (OGC), Administrative Law Division, for coordination and comments. After receiving the draft reply back from OGC, the final letter was prepared. Once completed, the original letter of inquiry and a copy of my response were sent to the Secretary's Office to be placed in a public file associated with the proceeding. Both parties to the proceeding, at that juncture, were served with copies of the correspondence.

**Interrogatory No. 7.** Identify any other persons who participated in any way in the preparation of the Managing Director's Letter and, with respect to each person so identified, describe the manner in which that person participated in the preparation of the Managing Director's Letter.

**Response:** As noted in my response immediately above, I contacted Steve Sewell, Assistant Chief, MMB, Video Services Division, who, to the best of my recollection, advised me, that, as far as he knew, the proceeding was restricted and indicated that I should talk further with Paul Gordon. I thereupon contacted Paul Gordon, Attorney Advisor, MMB, Video Services Division, who, to the best of my recollection, informed me that the proceeding was restricted.

To the best of my recollection, David Solomon, Deputy General Counsel, OGC and/or perhaps Steve Bailey, Attorney Advisor, OGC, Administrative Law Division, may have made some minor revisions and suggestions to the draft of the Managing Director's Letter of October 8, 1991.

**Interrogatory No. 8.** Identify all communications (written or oral) directed to you by anyone concerning the Managing Director's Letter between October 8, 1991 and July 1, 1993.

**Response:** None that I can recall.

**Interrogatory No. 9.** Identify all communications (written or oral) of which you are aware which were made by anyone to any FCC personnel between October 8, 1991 and July 1, 1993 concerning the Managing Director's Letter.

**Response:** I am not aware of any such communications.

**Interrogatory No. 10.** State whether inquiries concerning the Managing Director's Letter would, in the ordinary course of business, have been presented exclusively to you. If not, identify any other person(s) to whom such inquiries would, in the ordinary course of business, have been presented.

**Response:** In the ordinary course of business, inquiries relating to the Managing Director's Letter of October 8, 1991 would have been presented to me. It is possible, however, that such inquiries might have been presented to OMD, Office of the Secretary.

I declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information and belief.

  
Douglas A. Sandifer

Lawrence S. Schaffner  
Assistant General Counsel  
Office of General Counsel  
Federal Communications Commission  
1919 M Street, N.W., Suite 622  
Washington, D.C. 20554  
(202) 418-1720  
Attorney for Douglas A. Sandifer

April 9, 1996

**CERTIFICATE OF SERVICE**

I, Lawrence S. Schaffner, hereby certify that on this 9th day of April, 1996, I have caused copies of the foregoing "Answers of Douglas A. Sandifer to the First Set of Interrogatories" to be hand-delivered (as indicated below) or placed in the United States mail, first class postage prepaid, addressed to the following individuals:

The Honorable Joseph Chachkin  
Administrative Law Judge  
Federal Communications Commission  
2000 L Street, N.W. - Room 226  
Washington, D.C. 29554  
(By Hand)

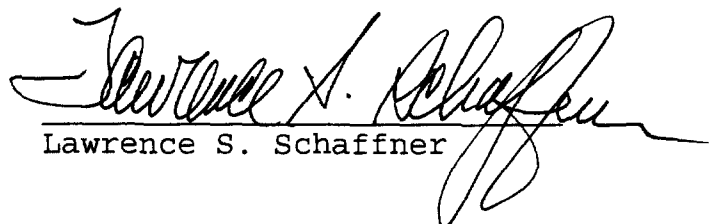
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Company, Inc.

Charles Dziedzic, Esquire  
Video Services Division  
Mass Media Bureau  
Federal Communications  
Commission  
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Barbara A. Kreisman, Clay  
Pendarvis and Robert  
Ratcliffe  
(By Hand)

  
Lawrence S. Schaffner

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AUG 14 1996

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In re Applications of )  
RAINBOW BROADCASTING COMPANY ) GC Docket No. 95-172  
For an extension of time ) File No. BMPCT-910625KP  
to construct ) File No. BMPCT-910125KE  
and ) File No. BTCCT-911129KT  
For an Assignment of its )  
construction permit for )  
Station WRBW(TV), Orlando, Florida )  
TO: The Honorable Joseph Chachkin  
Administrative Law Judge

PRESS BROADCASTING COMPANY, INC.  
HEARING EXHIBIT

NO. 22

Answers of Douglas A. Sandifer to  
the First Set of Interrogatories Propounded by  
Press Broadcasting Company, Inc.  
(April 9, 1996)

Federal Communications Commission	
Docket No. <u>95-172</u>	Exhibit No. <u>22</u>
Presented by <u>Harry Cole ESO / Press Broadcasting</u>	
Disposition	Identified <u>X</u>
	Received <u>      </u>
	Rejected <u>X</u>
Reporter <u>Patterson, Perry</u>	
Date <u>7/11/96</u>	

1  
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AUG 14 1996

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In re Applications of ) GC Docket No. 95-172  
RAINBOW BROADCASTING COMPANY ) File No. BMPCT-910625KP  
For an Extension of Time to ) File No. BMPCT-910125KE  
Construct ) File No. BTCCT-911129KT  
and )  
For an Assignment of its )  
Construction Permit for )  
Station WRBW(TV), Orlando, )  
Florida )

To: The Honorable Joseph Chachkin  
Administrative Law Judge

ANSWERS OF DOUGLAS A. SANDIFER TO  
THE FIRST SET OF INTERROGATORIES PROPOUNDED BY  
PRESS BROADCASTING COMPANY, INC.

Pursuant to Section 1.311(b)(2) of the Commission's Rules and the Presiding Judge's Order, FCC 96M-54, issued March 25, 1996, for release on March 28, 1996, Douglas A. Sandifer hereby submits his responses to the above-described interrogatories:

Interrogatory No. 1. State your current employment position.

Response: Ethics Program Specialist, Office of General Counsel, Federal Communications Commission.

Interrogatory No. 2. State the Office or Bureau or other organizational entity within the FCC to which you are currently assigned.

Response: The Office of General Counsel, Administrative Law Division.

Interrogatory No. 3. State the employment position you held as of October 8, 1991.

Response: Security Officer and Alternate Agency Ethics Official.

Interrogatory No. 4. State the Office or Bureau or other organizational entity within the FCC to which you were assigned as of October 8, 1991.

**Response:** The Office of Managing Director (OMD), Associate Managing Director for Operations, Operations Support Division.

**Interrogatory No. 5.** Describe your job responsibilities as of October 8, 1991.

**Response:** As Security Officer and the Alternate Agency Ethics Official, my duties included, but were not limited to, the investigation and preparation of responses to ex parte correspondence or inquiries received by the Commission. My activities involved the review of agency files and dockets, the preparation of draft correspondence, and the coordination of these matters with the appropriate Bureau/Office. Upon completion of such assignments for the Managing Director, the original incoming letter and a copy of the outgoing Commission reply were placed in a docket correspondence file. All parties to the particular matter in question were then served with a copy of the correspondence.

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**Response:** After receiving Mr. George G. Daniel's incoming letter in mid-September 1991, I reviewed the public file concerning the subject proceeding. I then consulted with Steve Sewell and Paul Gordon, Mass Media Bureau (MMB), Video Services Division, to determine the status of that proceeding, and whether or not it was restricted. Upon learning that the proceeding was restricted, I prepared a draft reply as reflected in the Managing Director's Letter of October 8, 1991. The draft of my reply was forwarded to Steve Bailey and David Solomon, Office of General Counsel (OGC), Administrative Law Division, for coordination and comments. After receiving the draft reply back from OGC, the final letter was prepared. Once completed, the original letter of inquiry and a copy of my response were sent to the Secretary's Office to be placed in a public file associated with the proceeding. Both parties to the proceeding, at that juncture, were served with copies of the correspondence.

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I declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information and belief.

  
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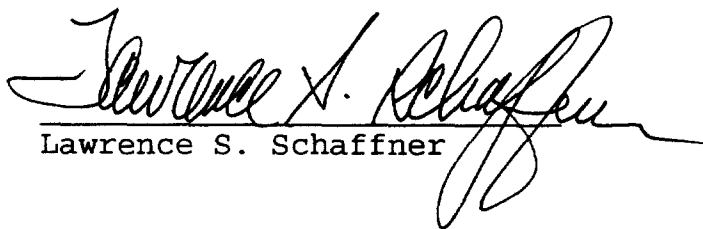
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Lawrence S. Schaffner